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Clerk of Court
Superior Court of CA,
County of Santa Clara
2014-1-CV-266866
Reviewed By:R. Walker

5 *Class Counsel and Counsel for Lead Plaintiff and Class*
6 *Representative, DeKalb County Employees Retirement Plan*

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14
15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 COUNTY OF SANTA CLARA

17 IN RE FIREEYE, INC. SECURITIES
18 LITIGATION

Lead Case No.: 1-14-cv-266866
(Consolidated with Case No.
1-14-CV-268110)

19 This Document Relates To:

20 ALL ACTIONS.

21 **NOTICE OF MOTION FOR FINAL
22 APPROVAL OF CLASS ACTION
23 SETTLEMENT AND PLAN OF
24 ALLOCATION OF SETTLEMENT
25 PROCEEDS**

26 Date: August 4, 2017
27 Time: 9:00 a.m.
28 Judge: Hon. Peter H. Kirwan
Dep't.: 19

Date Actions Filed: June 20, 2014
July 17, 2014

1 TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

2 PLEASE TAKE NOTICE THAT, on August 4, 2017, or as soon thereafter as the matter
3 may be heard in Department 19, the Courtroom of the Honorable Peter H. Kirwan at the Superior
4 Court of California, County of Santa Clara, 161 N. First Ave., San Jose, California, Plaintiff and
5 Court-appointed Class Representative DeKalb County Employees Retirement Plan will and
6 hereby does move the Court for an order finally approving the settlement of this class action and
7 approving the Plan of Allocation of Settlement proceeds. Specifically, this Motion seeks entry of
8 the attached [Proposed] Final Judgment and Order Dismissal, which (1) approves the Settlement
9 set forth in the Stipulation; (2) dismisses the action with prejudice; (3) enjoins the Releasing
10 Parties from commencing, instituting, or prosecuting any of the Released Claims; and (4) finds
11 that the Notice of Pendency and Proposed Settlement was given in accordance with the
12 Preliminary Approval Order, and that such Notice was reasonable and complied with due process.

13 This Motion is brought pursuant to the terms of the Stipulation of Settlement and this
14 Court's Order granting preliminary approval to this Settlement. Counsel for all parties have
15 conferred concerning the substance of this Motion, and Defendants do not oppose the entry of the
16 [Proposed] Final Judgment and Order. This Motion is based upon this notice of motion and
17 motion, the Memorandum of Points and Authorities in Support of Plaintiff's Motion for Final
18 Approval of Class Action Settlement and Plan of Allocation of Settlement Proceeds; the
19 Declaration of William C. Fredericks, the Claims Administrator Declaration of Justin Hughes, the
20 Stipulation of Settlement, all other pleadings and matters of record; and such additional evidence
21 or argument as may be presented in support of the motion.

22 Dated: June 30, 2017

Respectfully submitted,
SCOTT+SCOTT, ATTORNEYS AT LAW, LLP

23
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*Class Counsel and Counsel for Lead Plaintiff and
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Retirement Plan*

Dated: June 30, 2017

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